

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Donna Streier,
Plaintiff,

Court File No. 14-CV-3056 (JRT/HB)

v.

Enhanced Recovery Company,
Defendant.

**DECLARATION OF
ROCKY LANDOLL**

I, Rocky Landoll, hereby declare the following statements to be true to the best of my knowledge and recollection:

1. I am the Legal and License Officer for Defendant Enhanced Recovery Company, LLC (“ERC”) in the above-captioned matter. I have personal knowledge of the matters herein, and I am offering this declaration in support of ERC’s Motion to Extend Time to Answer.
2. On or about September 8, 2014, ERC was served via its registered agent, CT Corporation, with the Summons and Verified Complaint in the above-captioned matter.
3. After receiving notice of this lawsuit, ERC reached out to Plaintiff Donna Streier (“Streier”) to discuss the merits and possible resolution of the claim and to request an extension of time to respond to retain local counsel and to investigate the basis for the claim.

4. The results of ERC's initial investigation indicated that ERC did not call Streier with an automatic telephone dialing system ("ATDS") and had only called her on four occasions, suggesting the case should be resolved quickly.

5. However, ERC did not receive a response from Streier until shortly after the answer was due.

6. Having not received a response, ERC hired counsel in Jacksonville, Florida, who was instructed to retain local counsel in the District of Minnesota.

7. Plaintiff's position regarding consent to an extension is unknown to ERC at this time; therefore, ERC was compelled to file this motion.

I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on October 17, 2014.

s/ Rocky Landoll
Rocky Landoll